

ATTACHMENT 4

**Examples of Metrics That Passed Under
PMAP 2.6, But Failed Under PMAP 4.0**

- Customer Trouble Report Rate/PBX/Dispatch/AL (A.3.2.4.1)¹
- Out of Service > 24 hours/PBX/Dispatch/AL (A.3.5.4.1) (*id.* at 8)
- Reject Interval – Partially Mechanized – 10 hours/2W Analog Loop Design/AL (B.1.7.8) (*id.*)
- Reject Interval – Partially Mechanized – 10 Hours/Other Non-Design/AL (B.1.7.15) (*id.*)
- FOC Timeliness – Partially Mechanized – 10 Hours/2W Analog Loop w/LNP Design/AL (B.1.12.12) (*id.*)
- FOC & Reject Response Completeness – Mechanized/ISDN Loop (UDN, UDG/TAG/AL) (B.1.14.6.2) (*id.* at 10)
- FOC & Reject Response Completeness – Mechanized/Line Sharing/TAG/AL (B.1.14.7.2) (*id.*)
- FOC & Reject Response Completeness – Partially Mechanized/xDSL (ADSL, HDSL and UCL)/TAG/AL (B.1.15.5.2) (*id.*)
- FOC & Reject Response Completeness-Partially Mechanized/Other Non-Design/EDI (AL) (B.1.15.15.1) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Mechanized/2W Analog Loop with LNP Design/TAG/AL (B.1.17.12.2) (*id.* at 11)
- FOC & Reject Response Completeness (Multiple Responses) – Partially Mechanized/2W Analog Loop w/LNP Design/TAG/AL (B.1.18.12.2) (*id.* at 11)
- FOC & Reject Response Completeness (Multiple Responses) – Partially Mechanized/LNP Standalone/TAG/AL (B.1.18.17.2) (*id.*)
- % Jeopardies-Mechanized (UNE ISDN/AL)(B.2.5.6) (*id.* at 15)

¹ July 11 *ex parte*, AL Monthly State Summary Comparison Report at 7.

- % Provisioning Troubles Within 30 Days/Loop & Port Combinations \geq 10 Circuits/Non-Dispatch-AL)(B.2.19.3.2.2) (*id.* at 19)
- % Provisioning Troubles Within 30 days (Other Non-Design/ $<$ 10 Circuits/Dispatch/AL (B.2.19.15.1.1) (*id.* at 20)
- Service Inquiry With Firm Order/xDSL (ADSL/HDSL and UCL/AL) (F.3.1.1) (*id.* at 29)
- FOC & Reject & Response-Completeness-Mechanized/Business/TAG/KY (A.1.14.2.2)²
- FOC & Reject Response Completeness – Non-Mechanized/Design (Specials)/KY(A.1.16.3) (*id.*)
- Reject Interval-Partially Mechanized – 10 Hours/LNP Standalone/KY (B.1.17.17) (*id.* at 8)
- FOC Timeliness – Partially Mechanized – 10 hours/LNP Standalone/KY (B.1.12.17) (*id.* at 9)
- FOC & Reject Response Completeness – Mechanized/xDSL (ADSL, HDSL and UCL/EDI/KY) (B.1.14.5.1) (*id.*)
- FOC & Reject Response Completeness – Mechanized/xDSL (ADSL, HDSL and UCL/TAG/KY (B.1.14.5.2) (*id.*)
- FOC & Reject Response Completeness – Mechanized/Line Sharing/TAG/KY (B.1.14.7.2) (*id.*)
- FOC & Reject Response Completeness – Mechanized/Other Non-Design/TAG/KY (B.14.15.2) (*id.*)
- FOC & Reject Response Completeness-Non-Mechanized/Line Sharing/KY (B.1.16.7) (*id.* at 10)
- FOC & Reject Response Completeness/Non-Mechanized/INP Standalone/KY (B.1.16.16) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses)-Partially Mechanized/LNP Standalone/EDI/KY (B.1.17.17.1) (*id.*)

² *Id.*, KY Monthly State Summary Comparison Report at 1.

- FOC & Reject Responses Completeness (Multiple Responses)-Partially Mechanized/LNP Standalone/EDI/KY (B.1.18.17.1) (*id.* at 11)
- % Provisioning Troubles Within 30 Days/Loop & Port Combinations<10 Circuits/Dispatch/IN/KY (B.2.19.3.1.4) (*id.* at 17)
- % Provisioning Troubles Within 30 Days/Line Sharing <10 Circuits/Non-Dispatch (KY)(B.2.19.7.1.2) (*id.* at 18)
- % Provisioning Troubles Within 30 Days/Design (Specials)/<10 Circuits-Non-Dispatch/MS (A.2.12.3.1.2)³
- % Provisioning Troubles Within 30 Days/Centrex/<10 Circuits/Non-Dispatch/MS (A.2.12.5.1.2) (*id.*)
- % Provisioning Troubles Within 30 Days/ISDN/<10 Circuits/Non-Dispatch/MS (A.2.12.6.1.2) (*id.*)
- Reject Interval/ISDN Loop (UDN, UDC)/MS (B.1.7.6) (*id.* at 9)
- FOC Timeliness-Mechanized/Other Non-Design/MS (B.1.9.15) (*id.*)
- FOC Timeliness-Partially Mechanized-10 hours/Other Non-Design/MS (B.1.12.15) (*id.*)
- FOC & Reject Response Completeness-Mechanized/Other Non-Design/TAG/MS (B.1.14.15.2) (*id.* at 10)
- FOC & Reject Response Completeness-Partially Mechanized/xDSL (ADSL, HDSL and UCL) (EDI/MS) (B.1.15.5.1) (*id.*)
- FOC & Reject Response Completeness-Partially Mechanized/Other Non-Design/TAG/MS (B.1.15.15.2) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses)-Partially Mechanized/ISDN Loop (UDN, UDC)/TAG/MS (B.1.18.6.2) (*id.* at 11)
- FOC & Reject Response Completeness (Multiple Responses)-Partially Mechanized (2W Analog Loop w/LNP Design/TAG/MS (B.1.18.12.2) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses)-Partially Mechanized/LNP Standalone/EDI/MS (B.1.18.17.1) (*id.*)

³ *Id.*, MS Monthly State Summary Comparison Report at 4.

- FOC & Reject Response Completeness (Multiple Responses)-Non-Mechanized/2W Analog Loop w/LNP Design/MS (B.1.19.12) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses)-Non-Mechanized/INP Standalone/MS (B.1.19.16) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses)-Non-Mechanized/LNP Standalone/MS (B.1.19.17) (*id.*)
- % Jeopardies-Mechanized/Digital Loop<DS1/MS (B.2.5.18) (*id.* at 14)
- FOC & Reject Response Completeness-Non-Mechanized/Design (Specials)/NC (A.1.16.3)⁴
- FOC & Reject Response Completeness-Non-Mechanized/ISDN/NC (A.1.16.6) (*id.* at 2)
- Order Completion Interval/Business/<10 Circuits/Dispatch/NC (A.2.1.2.1.1) (*id.*)
- % Provisioning Troubles Within 30 Days/Design (Specials)/<10 Circuits/Non-Dispatch/NC (A.2.12.3.1.2) (*id.* at 4)
- % Provisioning Troubles Within 30 Days/PBX/>=10 Circuits/Non-Dispatch/NC (A.2.12.4.2.2) (*id.*)
- % Repeat Troubles Within 30 Days/PBX/Dispatch/NC (A.3.4.4.1) (*id.* at 8)
- Reject Interval-Non-Mechanized/2W Analog Loop w/NP Design/NC (B.1.8.10) (*id.* at 10)
- FOC Timeliness-Mechanized/Other Non-Design/NC (B.1.9.15) (*id.*)
- FOC Timeliness-Partially Mechanized-10 Hours/Line Sharing/NC (B.1.12.7) (*id.*)
- FOC Timeliness-Partially Mechanized-10 Hours/Other Non-Design/NC (B.1.12.15) (*id.*)
- FOC & Reject Response Completeness-Mechanized/xDSL (ADSL, HDSL and UCL/TAG/NC) (B.1.14.5.2) (*id.* at 11)
- FOC & Reject Response Completeness-Mechanized/Line Sharing/TAG/NC (B.1.14.7.2) (*id.*)

⁴ *Id.*, NC Monthly State Summary Comparison Report at 1.

- FOC & Reject Response Completeness-Mechanized/Other Non-Design/TAG/NC (B.1.14.15.2) (*id.*)
- FOC & Reject Response Completeness-Partially Mechanized/xDSL (ADSL, HDSL and UCL/EDI/NC) (B.1.15.5.1) (*id.*)
- FOC & Reject Response Completeness-Partially Mechanized/xDSL (ADSL, HDSL and UCL/TAG/NC) (B.1.15.5.2) (*id.*)
- FOC & Reject Response Completeness-Partially Mechanized/Other Non-Design/TAG/NC (B.1.15.15.2) (*id.*)
- FOC & Reject Response Completeness-Non-Mechanized/2W Analog Loop Design/NC (B.1.16.8) (*id.* at 12)
- FOC & Reject Response Completeness-Non-Mechanized/2W Analog Loop Non-Design/NC (B.1.16.9) (*id.*)
- FOC & Reject Response Completeness-Non-Mechanized/INP Standalone/NC (B.1.16.16) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Mechanized/2W Analog Loop w/LNP Design/EDI/NC (B.1.17.12.1) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Mechanized/2W Analog w/LNP Design/TAG/NC (B.1.17.12.2) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Mechanized/LNP Standalone/TAG/NC (B.1.17.17.2) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Partially Mechanized 2W Analog Loop w/LNP Design/EDI/NC (B.1.18.12.1) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Partially Mechanized/2W Analog Loop w/LNP Design/TAG/NC (B.1.18.12.2) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses)-Partially Mechanized/LNP Standalone/EDI/NC (B.1.18.17.1) (*id.* at 13)
- FOC & Reject Response Completeness (Multiple Responses) – Partially Mechanized/LNP Standalone/TAG/NC (B.1.18.17.2) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Non-Mechanized/2W Analog Loop Non-Design/NC (B.1.19.9) (*id.*)

- FOC & Reject Response Completeness (Multiple Responses) – Non-Mechanized/2W Analog Loop w/LNP Design/NC (B.1.19.12) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Non-Mechanized/Other Non-Design/NC (B.1.19.15) (*id.*)
- FOC & Reject Response Completeness (Multiple Responses) – Non-Mechanized/LNP Standalone/NC (B.1.19.17) (*id.*)
- % Jeopardies-Mechanized/Digital Loop <DSI/NC (B.2.5.18) (*id.* at 16)
- % Provisioning Troubles Within 30 Days/Loop & Port Combinations/<10 Circuits/Dispatch/NC (B.2.19.3.1.1) (*id.* at 20)
- % Provisioning Troubles Within 30 Days/Loop & Port Combinations/<10 Circuits/Switch Based Orders/NC (B.2.19.3.1.3) (*id.*)
- % Provisioning Troubles Within 30 Days/Line Sharing/<10 Circuits/Non-Dispatch/NC (B.2.19.7.2.1) (*id.*)
- % Provisioning Troubles Within 30 Days/Digital Loop<DSI<10 Circuits/Dispatch/NC (B.2.19.18.1.1) (*id.* at 21)
- Loop Makeup Inquiry (Manual)/Loops/NC (F.2.1) (*id.* at 30)

ATTACHMENT 5

Status of "Key" Measures in Florida Audit

"Key" Measure	Data Integrity Audit Status
Pre-Order Response Interval	Testing not complete in 2.6. Will test in 4.0
System Availability –Pre-Order/Order	Completed in 2.6. Will test in 4.0
Loop Make-Up Response Time	Completed in 2.6. Will test in 4.0
Acknowledgement Timeliness	Could not be tested in 2.6.
% Rejected Service Requests	Tested in 2.6 – open exceptions (120 and 143) LNP could not be tested in 2.6
FOC Timeliness	Tested in 2.6 – open exceptions (114 and 145) LNP could not be tested in 2.6
Reject Interval	Tested in 2.6 – open exceptions (36 and 144) LNP could not be tested in 2.6
Flow-Through	Tested in 2.6 – open exceptions (113 and 124)
Missed Appointments	Could not be tested in 2.6.
Average Completion Notice Interval	Could not be tested in 2.6.
% Provisioning Troubles in 30 days	Could not be tested in 2.6.
% Jeopardies	Could not be tested in 2.6.
Average Order Completion Interval	Could not be tested in 2.6.
Mean Held Order Interval	Could not be tested in 2.6.
Coordinated Customer Conversions	Completed in 2.6. Will test in 4.0.
Service Order Accuracy	Completed in 2.6. Will test in 4.0.
M&R Interface Availability	Completed in 2.6. Will test in 4.0.
M&R Response Interval	Completed in 2.6. Will test in 4.0.
Missed Repair Appointments	Could not be tested in 2.6.
Maintenance Average Duration	Could not be tested in 2.6.
% Repeat Troubles in 30 days	Could not be tested in 2.6.
Customer Trouble Report Rate	Could not be tested in 2.6.
Invoice Accuracy	Completed in 2.6. Will test in 4.0.
Mean Time To Deliver Invoices	Completed in 2.6. Will test in 4.0.
Usage Data Accuracy	Completed in 2.6. Will test in 4.0.
Usage Data Delivery Timeliness	Completed in 2.6. Will test in 4.0.
Usage Data Delivery Completeness	Completed in 2.6. Will test in 4.0.
Trunk Group Performance	Completed in 2.6. Will test in 4.0.
% Due Dates Missed Collocation	Completed in 2.6. Will test in 4.0.

Other measures not tested in 2.6:

1. Acknowledgment Completeness
2. % rejected svc requests, reject interval, and FOC interval for trunks
3. FOC and Reject Completeness
4. % Completions/Attempts with no Notice
5. % Cooperative Acceptance Testing – xDSL
6. LNP Disconnect Timeliness
7. M&R Out of Service > 24 hours
8. M&R Average Time to Answer

ATTACHMENT 5A

PERFORMANCE MEASURES

Florida Third Party Test

	E/ O	DATE OPENED	AFFECTED METRICS	DESCRIPTION
				<i>DATA INTEGRITY (PMR-4)</i>
1	E-36	3/21/01	FOC and rejection timeliness	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).
2	E-113	10/4/01	Flow-through	KPMG has found that BST does not capture xDSL transactions in flow-through measure.
3	E-114	10/5/01	FOCs	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for FOCs for June 2001 data.
4	E-120	11/13/01	% Rejected Service Requests	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for fully and partially mechanized orders for the % rejected service requests (non-trunks).
5	E-143	02/04/02	% Rejected Service Requests	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for % rejected service requests non-trunks for June 01 data.
6	E-144	02/04/02	Reject Interval	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for reject interval - non-trunks for June 01 data
7	E-145	02/04/02	FOC Timeliness	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for FOC Timeliness - non-trunks for June 01 data
8	E-174	6/25/02	Provisioning metrics	Values of the Completion Date Filed were inconsistent when comparing the Legacy/source extracts to the corresponding RADS snapshots for the WFAP system for data used in the calculation of certain Provisioning related SQMs.

PERFORMANCE MEASURES

	E/ O	DATE OPENED	AFFECTED METRICS	DESCRIPTION
				<i>DATA INTEGRITY (PMR-4)</i>
9	E- 175	6/26/02	Ordering Metrics	BST incorrectly excludes records during transfer of data between the Legacy extracts for the EDI system and the corresponding RADS Snapshots for February 2002 data.
10	E- 176	7/22/02	Ordering Metrics	BST incorrectly excludes records during transfer of data between the Legacy extracts for the LON system and the corresponding RADS Snapshots for February 2002 data
11	E- 177	7/26/02	Average Response Interval	KPMG found that the average value for response intervals were different for certain categories when comparing the Legacy source extracts data to the corresponding RADS snapshots for the RNS system for March 2002.

PERFORMANCE MEASURES

Florida Third Party Test

		DATE OPENED	AFFECTED METRIC	DESCRIPTION
				<i>METRICS CALCULATION/REPLICATION (PMR-5)</i>
1	E- 124	12/05/01	Flow through report	KPMG cannot replicate the values for November 2000.
2	E- 151	02/22/0)	Completions/attempts without notice or with less than 24 hours notice measure	KPMG cannot replicate the values . RDUM instructions insufficient. (Previously observation 139)
3	E- 153	02/22/02	LNP Total Service Order Cycle Time	KPMG cannot replicate the values. (Previously observation 113)
4	O- 176	03/19/02	Average Completion Notice Interval	KPMG cannot replicate the values.
5	O- 185	04/23/02	Hot Cut Timeliness % within interval and average interval	KPMG cannot replicate the values.
6	O- 195	04/26/02	Reject Interval	KPMG cannot replicate the values in the SQM report for the CLEC aggregate (September 2001).
7	E- 163	05/06/02	LNP % rejected service requests	KPMG cannot replicate the values. (Formerly Observation 179)
8	O- 200	05/20/02	LNP reject interval and % reject.	KPMG has found that BST's implemented exclusions for the metrics are inconsistent with the documented exclusions.
9	O- 204	06/06/02	FOC SQM	KPMG cannot replicate the values for the Test CLEC (January 2002)
10	O- 206	06/17/02	Mean Held Order Interval	KPMG cannot replicate the values for August 2001.
11	O- 207	06-28-02	Acknowledgement Message Timeliness	KPMG cannot replicate the values in the metric for April 2002.
12	O- 208	07/09/02	E-911 Mean Interval	KPMG cannot replicate the values in the SQM for April 2002.
13	O- 210	07/15/02	Provisioning % missed appointments	KPMG cannot replicate the values for April 2002
14	O- 211	07/15/02	M&R % missed appointments	KPMG cannot replicate the values for April 2002
15	O- 212	07/15/02	M&R Out of Service > 24 hours	KPMG cannot replicate the values for April 2002
16	O- 213	0719/02	Service Inquiry with LSR FOC Response Time	KPMG cannot replicate the values for April 2002.

PERFORMANCE MEASURES

Georgia Third Party Test

	E/ O	DATE OPENED	AFFECTED METRICS	DESCRIPTION
				<i>DATA INTEGRITY (PMR-4)</i>
1	E-149	4/29/02	% Rejected Service Requests	BST incorrectly excludes data between the BARNEY snapshots and the NDOS stages of the PMAP process that go into the calculation of fully mechanize orders for the % rejected service requests for June 2001.
2	E-154	7/10/02	M&R Metrics	BST incorrectly excludes records during transfer of data between the Legacy extracts for the LMOS system and the corresponding RADS snapshots for data that go into the calculation of Maintenance and Repair SQM for February 2002.

		DATE OPENED	AFFECTED METRIC	DESCRIPTION
				<i>METRICS CALCULATION/REPLICATION (PMR-5)</i>
1	E-142	12/6/01	Jeopardy Interval and % Jeopardy	KPMG could not replicate the values for July 2001.
2	E-144	2/5/02	% Completions/Attempts without notice or with < 24 hours notice	BST's Raw Data User's Manual (RDUM) does not provide sufficient instructions for replicating values.
3	E-148	3/19/02	LNP Reject Interval	KPMG cannot replicate the values for December 2001.
4	E-150	5/15/02	Reject Interval	KPMG cannot replicate the values for February 2002.
5	E-152	6/4/02	% Provisioning Troubles in 30 days	KPMG cannot replicate the values for January 2002
6	E-155	7/16/02	Jeopardy Notice Interval and % Jeopardy	KPMG could not replicate the values for April 2002. BST's Raw Data User's Manual (RDUM) does not provide sufficient instructions
7	E-156	7/16/02	E-911	KPMG could not replicate the values for April 2002

PERFORMANCE MEASURES

Georgia Third Party Test

		DATE OPENED	AFFECTED METRIC	DESCRIPTION
				<i>SEEM (PMR-7)</i>
1	E- 153	7/8/02	All	BellSouth did not distribute SEEM reports in a timely manner for April 2002 data.

ATTACHMENT 6

FLORIDA OSS BELLSOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90



Florida OSS Test
3rd Amended Exception #90

Date: February 15, 2002

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV1).

Exception:

KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)

Background:

The Bell South Products & Service Interval Guide¹ states that BellSouth should return 85% of Non-Mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within a defined interval for each product type.

Issue:

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
Instances	128	31	159
Percentage	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL

¹ BellSouth Products & Services Interval Guide – Issue 4a 2001

FLORIDA OSS BELLSOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

Amended Exception:

KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.

Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan², BellSouth should return $\geq 85\%$ of non-mechanized FOCs to CLECs within 36 hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs after the 36-hour interval has elapsed.

Issue:

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

	<36 hrs	≥ 36 and	≥ 48 and	≥ 72	
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² BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

FLORIDA OSS BELLSOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

ISSUE 1		<48 hrs	<72 hrs	hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
6	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM

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Item	PON	Ver	CC	LSR Sent	FOC Received
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

BellSouth's Response:

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRSG. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

- Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 3: Agree with KPMG. UNE Combo BRI.
- Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.

FLORIDA OSS BELL SOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

- Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 8: Agree with KPMG. Resale BRI.
- Item 9: Agree with KPMG. Resale BRI.
- Item 10: Agree with KPMG. UNE Combo BRI.
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

- Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 22: Agree with KPMG. UNE Combo BRI.
- Item 23: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 24: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 25: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 26: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 27: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 28: Agree with KPMG. UNE Combo BRI.
- Item 29: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 30: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
- Item 31: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.

FLORIDA OSS BELL SOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

- Item 32: Agree with KPMG. UNE Combo BRI.
- Item 33: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 34: Do not agree. UNE Combo BRI. CRSG has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.
- Item 35: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 36: Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.
- Item 37: Agree with KPMG. Resale BRI.
- Item 38: Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.
- Item 39: Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.
- Item 40: Do not agree. LSR received 07/18 15:06. FOC sent 07/19 10:55.
- Item 41: Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.
- Item 42: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 43: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 44: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 45: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 46: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 47: Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.
- Item 48: Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.
- Item 49: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 50: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 51: Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.
- Item 52: Do not agree. UNE Combo BRI. LSR received 06/26 12:13.
- Item 53: Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.
- Item 54: Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.
- Item 55: Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.
- Item 56: Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.
- Item 57: Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

FLORIDA OSS BELL SOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):

# of Transactions	= 157 (36 PONS excluded – SQM O-9 does not apply)
# Missed FOCs	= 6
# Met FOCs	= <u>151</u>
% FOCs Returned	= 96.2%

2nd Amended Issue:

In KPMG Consulting's professional opinion orders sent to the CRSG that do not require a service inquiry should be evaluated in a manner similar to O-9 of BellSouth's Service Quality Measurement Plan³. During the production test of non-mechanized orders, BellSouth returned 34% of FOCs in greater than a 36 hour time frame. The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

³ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

FLORIDA OSS BELL SOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

ISSUE 2	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	84	6	14	23	127
Percent	66%	5%	11%	18%	100%

The following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	035051FPMC010005	00	9990	6/18/01 4:10 PM	6/27/01 3:11 PM
2	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
3	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
4	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
5	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
6	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
9	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
12	042031FPMC000002	01	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
13	042031FPMC000004	01	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
14	042031FPMC000005	01	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
15	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 2:02 PM
16	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
17	051021FPMC001004	01	9990	11/14/01 12:30 PM	11/29/01 3:52 PM
18	051021FPMC000007	01	9990	11/14/01 12:30 PM	11/29/01 4:05 PM
19	051021FPMC010008	01	9990	11/14/01 12:26 PM	11/21/01 9:41 AM
20	051021FPMC000009	01	9990	11/8/01 3:07 PM	11/20/01 5:56 PM
21	051021FPMC010010	01	9990	11/14/01 12:26 PM	11/21/01 9:43 AM
22	051021FPMC000012	01	9990	11/8/01 3:07 PM	11/20/01 5:55 PM
23	051021FPMC000013	01	9990	11/13/01 8:24 PM	11/21/01 10:10 AM
24	051021FPMC010015	01	9990	11/13/01 8:27 PM	11/21/01 9:58 AM
25	051021FPMC000016	01	9990	11/14/01 9:15 PM	11/29/01 4:05 PM
26	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
28	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
29	056012FPMC020004	00	9990	8/3/01 10:23 AM	8/27/01 10:21 AM
30	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
31	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
32	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
33	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
34	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
35	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
36	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
37	058022FPMC000001	01 CR 02	9993	7/17/01 3:41 PM	7/30/01 3:12 PM

FLORIDA OSS BELLSOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

Item	PON	Ver	CC	LSR Sent	FOC Received
38	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
39	058031FPMC000001	00	9993	4/3/01 10:47 AM	4/12/01 5:36 PM
40	058031FPMC000003	00	9993	4/3/01 9:55 AM	4/10/01 5:08 PM
41	058031FPMC000005	00	9993	4/3/01 10:21 AM	4/10/01 5:08 PM
42	058031FPMC000007	01	9993	4/10/01 3:08 PM	4/17/01 4:45 PM
43	060011FPMC000006	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:54 AM
44	060011FPMC000008	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:56 AM

Impact:

The receipt of timely FOCs is critical to the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

BellSouth's Response:

As BellSouth described in its 2nd response to KPMG's 1st amended exception, the SQM O-9 identified in this exception for Non-Mechanized LSRs applies to the LCSC as it specifically states in the Business Rules: "The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON."

The SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's analysis of the 57 PONs KPMG identified in this exception indicates that only 4 should be measured under the SQM O-9 measure which applies to the LCSC. The remaining 53 were sent to the CRSG (SQM O-9 does not apply).

BellSouth disagrees with KPMG assessment of the 2nd amended issue. BellSouth has been ordered and strives to meet the 2200+ levels of disaggregated measures that have been ordered by the Florida commission. Where these measures do not cover specific products, BellSouth has committed to provide levels of service as described within the Products and Services Interval Guide for FOC timeliness.

BellSouth cannot unilaterally change the SQM measures without the approval of the Florida Commission. KPMG can consider addressing this issue and their opinion in the metrics adequacy review, and apply the current standards as they are described in the approved SQM manual and in the Products and Services Interval Guide for the purpose of this test.

3rd Amended Issue:

FLORIDA OSS BELL SOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

Upon review of BellSouth's Service Quality Measurement Plan⁴ and the BellSouth Products and Services Interval Guide⁵, KPMG Consulting determined that BellSouth is returning FOCs in greater than the allotted time specified in the documents referenced above.

Orders e-mailed to the CRSG that require a BellSouth internal Service Inquiry form, were evaluated by KPMG Consulting under the measures specified in 0-10⁶ of the SQM. For orders e-mailed to the CRSG that did not require a BellSouth internal Service Inquiry form, and were therefore not measured under 0-10, KPMG Consulting, referred to the Targeted LSR Processing Interval, outlined in the Products and Services Interval Guide. Orders sent via fax to the to the Local Carrier Service Center (LCSC) are measured under 0-9 of the SQM.

During the production test of non-mechanized orders, BellSouth returned 26% of FOCs in greater than the stated FOC interval time frame. The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

⁴ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

⁵ BellSouth Products and Services Interval Guide-5A January 2002

⁶ KPMG Consulting reviewed the 0-10 measure for the purposes of this exception only and will not be evaluating BellSouth on measure 0-10 in the BellSouth OSS Evaluation Final Report.

FLORIDA OSS BELL SOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

ISSUE 3	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	94	5	8	20	127
Percent	74%	4%	6%	16%	100%

The following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

#	Product	REQTYP ACT	BLS SI	PON	VER	CC	LSR Sent	FOC Received
1	56K Synchronet	E/N	Y	056012FPMC020004	0	9990	8/3/2001 10:23	8/27/2001 10:21
2	56K Synchronet	E/N	Y	056012FPMC000010	0	9990	5/24/2001 15:40	6/15/2001 14:57
3	UNE Combo BRI	M/C	Y	040061FPMC000003	0	9993	5/18/2001 15:06	6/8/2001 15:06
4	56K Synchronet	E/C	Y	058022FPMC000002	0	9993	3/15/2001 12:09	4/3/2001 13:46
5	UNE Combo PRI	M/V	N	035081FPMC000006	0	9990	5/4/2001 13:48	5/23/2001 9:26
6	UNE Combo PRI	M/V	N	035081FPMC000004	0	9990	5/4/2001 13:46	5/22/2001 15:08
7	UNE Combo DS1	M/V	N	051021FPMC000007	1	9990	11/14/2001 12:30	11/29/2001 16:05
8	UNE Combo DS1	M/V	N	051021FPMC001004	1	9990	11/14/2001 12:30	11/29/2001 15:52
9	UNE Combo DS1	M/V	N	051021FPMC000016	1	9990	11/14/2001 21:15	11/29/2001 16:05
10	UNE Combo PRI	M/V	N	035081FPMC000007	0	9990	5/4/2001 13:49	5/18/2001 14:15
11	UNE Combo PRI	M/V	N	035081FPMC000003	1	9990	5/7/2001 17:00	5/21/2001 13:38
12	UNE Combo BRI	M/V	N	036121FPMC000002	0	9990	6/13/2001 17:22	6/27/2001 10:54
13	Resale DS1	N/C	N	060011FPMC000008	0	9993	8/6/2001 17:15	8/20/2001 9:56
14	Resale DS1	N/C	N	060011FPMC000006	0	9993	8/6/2001 17:15	8/20/2001 9:54
15	56K Synchronet	E/C	Y	058022FPMC000001	1	9993	7/17/2001 15:41	7/30/2001 15:12
16	UNE Combo PRI	M/V	N	035081FPMC020005	0	9990	6/14/2001 10:40	6/26/2001 16:06
17	56K Synchronet	E/N	Y	056012FPMC000009	0	9990	4/3/2001 12:18	4/13/2001 16:24
18	56K Synchronet	E/N	Y	056012FPMC000013	0	9990	5/7/2001 12:23	5/17/2001 15:49
19	UNE Combo DS1	M/V	N	051021FPMC000009	1	9990	11/8/2001 15:07	11/20/2001 17:56
20	UNE Combo DS1	M/V	N	051021FPMC000012	1	9990	11/8/2001 15:07	11/20/2001 17:55
21	UNE Combo BRI	M/V	N	035051FPMC010005	0	9990	6/18/2001 16:10	6/27/2001 15:11
22	Resale PRI	E/N	Y	042031FPMC000006	0	9990	7/18/2001 16:54	7/27/2001 14:02
23	Resale PRI	E/N	Y	042031FPMC000007	0	9990	7/18/2001 16:55	7/27/2001 9:56
24	UNE Combo PRI	M/V	N	035081FPMC010001	0	9990	4/5/2001 16:19	4/13/2001 15:49
25	UNE Combo DS1	M/V	N	051021FPMC000013	1	9990	11/13/2001 20:24	11/21/2001 10:10
26	UNE Combo DS1	M/V	N	051021FPMC010015	1	9990	11/13/2001 20:27	11/21/2001 9:58
27	Resale PRI	E/N	Y	042031FPMC000002	1	9990	7/18/2001 16:48	7/25/2001 18:23
28	UNE Combo BRI	M/V	N	036021FPMC010001	1	9990	5/17/2001 16:13	5/24/2001 16:20
29	UNE Combo DS1	M/V	N	051021FPMC010010	1	9990	11/14/2001 12:26	11/21/2001 9:43
30	UNE Combo DS1	M/V	N	051021FPMC010008	1	9990	11/14/2001 12:26	11/21/2001 9:41
31	Resale PRI	E/N	Y	042031FPMC000004	1	9990	7/18/2001 16:51	7/25/2001 12:13
32	Resale PRI	E/N	Y	042031FPMC000005	1	9990	7/18/2001 16:53	7/25/2001 12:12
33	UNE Combo BRI	M/V	N	036021FPMC000002	0	9990	6/1/2001 10:53	6/6/2001 17:46

FLORIDA OSS BELLSOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

Impact:

The receipt of timely FOCs is critical to a CLECs ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the timeliness of the completion of CLEC orders, decreasing overall CLEC customer satisfaction.

BellSouth's 3rd Amended Response:

BellSouth agrees with KPMG's evaluation of 30 of the 127 PONs. However, as stated in the 2nd response to KPMG's 1st amended exception, the SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's findings for each PON are listed below by item number:

- Item 1: Agree with KPMG. 56K Synchronet. Employee error.
- Item 2: Agree with KPMG. 56K Synchronet. Employee error.
- Item 3: Do not agree. UNE Combo BRI. CRSG SD advised CLEC paperwork received was duplicate of an existing PON. Correct paperwork sent to SD on 06/04/2001. FOC to CLEC 06/08/2001. Met interval based on 06/04/2001 submission of correct paperwork.
- Item 4: Agree with KPMG. 56K Synchronet request. Employee error.
- Item 5: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 6: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 7: Do not agree. No record of PON in CRSG.
- Item 8: Do not agree. No record of PON in CRSG.
- Item 9: Agree with KPMG. UNE Combo DS1. Employee error.
- Item 10: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 11: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 12: Agree with KPMG. UNE Combo BRI. Employee error.
- Item 13: Agree with KPMG. Resale DS1. Missed interval.
- Item 14: Agree with KPMG. Resale DS1. Missed interval.
- Item 15: Agree with KPMG. 56K Synchronet. Employee error.
- Item 16: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 17: Agree with KPMG. 56K Synchronet. Missed interval.
- Item 18: Agree with KPMG. 56K Synchronet. Missed interval.
- Item 19: Agree with KPMG. UNE Combo DS1. Employee error.
- Item 20: Agree with KPMG. UNE Combo DS1. Employee error.
- Item 21: Agree with KPMG. UNE Combo BRI. Employee error.
- Item 22: Agree with KPMG. Resale PRI. Employee error.
- Item 23: Agree with KPMG. Resale PRI. Employee error.

FLORIDA OSS BELLSOUTH'S RESPONSE TO 3RD AMENDED EXCEPTION 90

Item 24: Agree with KPMG. UNE Combo PRI. Employee error.
Item 25: Agree with KPMG. UNE Combo DS1. Employee error.
Item 26: Agree with KPMG. UNE Combo DS1. Employee error.
Item 27: Agree with KPMG. Resale PRI. Employee error.
Item 28: Agree with KPMG. UNE Combo BRI. Employee error.
Item 29: Agree with KPMG. UNE Combo DS1. Employee error.
Item 30: Agree with KPMG. UNE Combo DS1. Employee error.
Item 31: Agree with KPMG. Resale PRI. Employee error.
Item 32: Agree with KPMG. Resale PRI. Employee error.
Item 33: Agree with KPMG. UNE Combo PRI. Internal CRSG delay. Missed interval.

Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations:

Agree with KPMG findings	30
Disagree with KPMG findings	3

The receipt of timely Non-mechanized FOCs is as follows:

Number of Transactions	127
Number of Transactions-No Record	2
Number of Transactions Missed FOCs	30
Base Number	125
Number of Transactions Met FOCs	<u>95</u>
% FOC Returned	76%

BellSouth will cover personnel on FOC Timeliness to prevent future recurrence of the issues identified in the items referenced above by February 28, 2002.

ATTACHMENT 7

REQUEST: Describe in which performance measures BellSouth reports its rejection and FOC performance for each type of LSR submitted to the Complex Resale Support Group (CRSG).

RESPONSE: LSRs submitted to the CRSG and included in Performance Measurements results are currently reported in BellSouth's SQM in the Non-Mechanized categories for Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness, and Firm Order Confirmation and Reject Response Completeness under the following products:

Resale Design (Specials)
UNE Loop + Port Combinations
xDSL
Local Interoffice Transport

Additionally xDSL and Local Interoffice Transport are reported in BellSouth's SQM in Service Inquiry with LSR Firm Order Confirmation Response Time - Manual.

ATTACHMENT 8

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 161



FL Exception #161

Date: July 18, 2002

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation. (TVV1)

Exception:

KPMG Consulting has not received timely Non-Mechanized rejects from BellSouth.

Background:

According to Ordering Measure O-8 of the Service Quality Measurement Plan¹, BellSouth should return at least 85% of non-mechanized rejects to Competitive Local Exchange Carriers (CLECs) within 24 hours of receiving the Local Service Request (LSR).

Issue:

During the production retest of the non-mechanized interface, BellSouth returned 76.42% of non-mechanized rejects during the 24-hour time frame, which does not meet Ordering Measure O-8 of the SQM Plan.

The following table lists the non-mechanized Reject timeliness results as of February 28, 2002.

ISSUE 1	<24 hrs	>=24 & <48 hrs	>=48 & <72 hrs	>=72 hrs	Total
Number of Transactions	94	13	16	0	123
Percent	76.42%	10.57%	13.01%	0%	100%

The following PONs received a non-mechanized reject beyond the 24-hour time frame:

¹ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 161

Item#	PON	Ver	CC	LSR Sent	Reject Received	BellSouth's Findings
1	040031HPMJ000004	00	9990	03/13/02 06:28 PM	03/21/02 05:42 PM	LSR sent to CRSG – SQM O-8 does not apply.
2	040031HPMJ000005	00	9990	03/13/02 06:29 PM	03/21/02 05:42 PM	LSR sent to CRSG – SQM O-8 does not apply.
3	040031HPMJ000001	00	9990	03/13/02 06:24 PM	03/21/02 03:59 PM	LSR sent to CRSG – SQM O-8 does not apply.
4	040031HPMJ000002	00	9990	03/13/02 06:25 PM	03/21/02 03:59 PM	PON not found
5	040031HPMJ000003	00	9990	03/13/02 06:27 PM	03/21/02 03:59 PM	PON not found
6	058931HPMC000002	00	9993	03/22/02 10:22 AM	03/29/02 05:30 PM	LSR sent to CRSG – SQM O-8 does not apply.
7	058931HPMC000003	00	9993	03/22/02 10:22 AM	03/29/02 05:30 PM	LSR sent to CRSG – SQM O-8 does not apply.
8	058931HPMC000007	00	9993	03/22/02 10:22 AM	03/29/02 05:30 PM	LSR sent to CRSG – SQM O-8 does not apply.
9	058931HPMC000008	00	9993	03/22/02 10:22 AM	03/29/02 05:30 PM	LSR sent to CRSG – SQM O-8 does not apply.
10	058931HPMC000009	00	9993	03/22/02 10:22 AM	03/29/02 05:30 PM	LSR sent to CRSG – SQM O-8 does not apply.
11	058931HPMC001004	00	9993	03/22/02 10:22 AM	03/29/02 05:30 PM	LSR sent to CRSG – SQM O-8 does not apply.
12	040031HPMJ000006	00	9990	03/13/02 06:30 PM	03/21/02 12:23 PM	LSR sent to CRSG – SQM O-8 does not apply.
13	040031HPMJ000007	00	9990	03/13/02 06:31 PM	03/21/02 12:20 PM	LSR sent to CRSG – SQM O-8 does not apply.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 161

Item#	PON	Ver	CC	LSR Sent	Reject Received	BellSouth's Findings
14	040031HPMJ000008	00	9990	03/13/02 06:33 PM	03/21/02 12:18 PM	LSR sent to CRSG – SQM O-8 does not apply.
15	040031HPMJ000009	00	9990	03/13/02 06:34 PM	03/21/02 11:22 AM	LSR sent to CRSG – SQM O-8 does not apply.
16	040031HPMJ000010	00	9990	03/13/02 06:35 PM	03/21/02 11:22 AM	LSR sent to CRSG – SQM O-8 does not apply.
17	058931HPMC000010	00	9993	03/22/02 10:53 AM	03/28/02 04:38 PM	LSR sent to CRSG – SQM O-8 does not apply.
18	058931HPMC000006	00	9993	03/22/02 10:53 AM	03/28/02 04:37 PM	LSR sent to CRSG – SQM O-8 does not apply.
19	058931HPMC000001	00	9993	03/22/02 10:53 AM	03/28/02 04:36 PM	LSR sent to CRSG – SQM O-8 does not apply.
20	058931HPMC000005	00	9993	03/22/02 10:54 AM	03/28/02 04:37 PM	LSR sent to CRSG – SQM O-8 does not apply.
21	058931HPMC000011	00	9993	03/22/02 10:54 AM	03/28/02 04:37 PM	LSR sent to CRSG – SQM O-8 does not apply.
22	043911HPMC0N0001	00	9990	03/11/02 12:03 PM	03/14/02 11:10 AM	LSR sent to CRSG – SQM O-8 does not apply.
23	027051HPMC000010	00	9993	04/15/02 04:09 PM	04/18/02 02:21 PM	LSR sent to CRSG – SQM O-8 does not apply.
24	027051HPMC000006	00	9993	04/15/02 04:07 PM	04/18/02 01:01 PM	LSR sent to CRSG – SQM O-8 does not apply.
25	027051HPMC000004	00	9993	04/15/02 04:01 PM	04/18/02 12:44 PM	LSR sent to CRSG – SQM O-8 does not apply.
26	027051HPMC000005	00	9993	04/15/02 04:06 PM	04/18/02 12:44 PM	LSR sent to CRSG – SQM O-8 does not apply.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 161

Item#	PON	Ver	CC	LSR Sent	Reject Received	BellSouth's Findings
27	027051HPMC000008	00	9993	04/15/02 04:08 PM	04/18/02 12:45 PM	LSR sent to CRSG – SQM O-8 does not apply.
28	027051HPMC000007	00	9993	04/15/02 04:08 PM	04/18/02 12:44 PM	LSR sent to CRSG – SQM O-8 does not apply.
29	027051HPMC000009	00	9993	04/15/02 04:09 PM	04/18/02 12:45 PM	LSR sent to CRSG – SQM O-8 does not apply.

Impact:

The receipt of timely rejects is a critical factor in the CLEC's ability to process service requests and meet its customer's needs. Delays in the return of rejects may negatively impact the timeliness of the ordering process, decreasing CLEC customer satisfaction.

BellSouth's Response:

BellSouth's findings are shown in the above chart by item number.

BellSouth disagrees with KPMG Consulting's assessment of all items identified in this exception. As indicated above, 27 PONs were sent directly to the CRSG and 2 were not found. Ordering Measure O-8 of the SQM does not apply to the process for the complex products and services that are handled by the CRSG. The SQM O-8 Business Rules for Non-Mechanized LSRs specifically states: "The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC."

The CRSG Guidelines (Chapter 9.0, Pages 23 & 24) that provide the Rejection and Clarification Standards for complex products and services are located on the Interconnection Services website.

Summary of Reject Interval Results – Non –Mechanized LSRs: (27 PONS excluded – SQM O-8 does not apply and 2 not found)

# of Transactions	= 94
# Met Reject Interval	= <u>94</u>
% Rejects Returned	100%

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 161

BellSouth's Amended Response:

BellSouth would like to further clarify the SQM O-8 and O-9 measures. As previously described in responses to exceptions associated with these measures, KPMG Consulting misapplied these measures associated with assessing timeliness of Rejects/Clarifications and Firm Order Confirmations (FOCS).

The Business Rules for Non-Mechanized LSRs for the SQM O-8 state: "The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC." The Business Rules for Non-Mechanized LSRs for the SQM O-9 state: "The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON."

When the CRSB submits the appropriate ordering package to the LCSC, and a clarification or FOC is returned to the CLEC, then these time intervals associated for these measures are captured through the Local Order Number (LON) Tracking System and reported in the SQM reports. Thus, these products are captured in the O-8 and O-9 SQM, but only for the portion of time while being processed in the LCSC.